

1401 Main Street, Suite 900  
Columbia, SC 29201



Phone: (803) 737-0800  
www.regulatorystaff.sc.gov

[shudson@regstaff.sc.gov](mailto:shudson@regstaff.sc.gov)

*Shannon Bowyer Hudson*  
Counsel for ORS

March 9, 2018

**VIA U.S. MAIL**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**RECEIVED**

MAR 13 2018

PSC SC  
MAIL / DMS

Re: Continuing Audit Information Request ("AIR") for Consolidated Docket Nos.:  
2017-207-E (5th Continuing AIR)  
2017-305-E (4th Continuing AIR)  
2017-370-E (4th Continuing AIR)

Dear Ms. Boyd:

Please find enclosed the South Carolina Office of Regulatory Staff's Continuing Audit Information Request ("AIR") for the consolidated dockets referenced above along with its cover letter which was served on South Carolina Electric & Gas Company and Dominion Energy, Inc. today.

Sincerely,

*Shannon B. Hudson*

Shannon B. Hudson

Enclosure

cc: F. David Butler Esquire (via e-mail)  
Joseph M. Melchers, Esquire (via e-mail)  
All Parties of Record in Docket No. 2017-305-E (via e-mail)  
All Parties of Record in Docket No. 2017-207-E (via e-mail)  
All Parties of Record in Docket No. 2017-370-E (via e-mail)

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*Shannon Bowyer Hudson*  
Counsel for ORS

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MAR 13 2018

**PSC SC  
MAIL / DMS**

March 9, 2018

**VIA ELECTRONIC MAIL**

K. Chad Burgess, Esquire  
South Carolina Electric & Gas Company  
220 Operation Way-MC C222  
Cayce, South Carolina 20033-3701

Lisa S. Booth, Esquire  
Dominion Energy Services, Inc.  
120 Tredegar Street  
P.O. Box 26532  
Richmond, Virginia 23261-6532

Re: Continuing Audit Information Request ("AIR") for Consolidated Docket Nos.:  
2017-207-E (5th Continuing AIR) <sup>1</sup>  
2017-305-E (4th Continuing AIR) <sup>1</sup>  
2017-370-E (4th Continuing AIR)

Dear Mr. Burgess and Ms. Booth:

Please find enclosed and served on you South Carolina Office of Regulatory Staff's ("ORS") Continuing Audit Information Request as referenced above. Please note that pursuant to S.C. Code § 58-4-55(A), ORS is requiring that the responses be provided under oath. ORS also asks that individual responses be provided early if they are completed prior to the due date.

(Continued...)

<sup>1</sup> A First Continuing Audit Information Request for Records and Information Pursuant to Commission Order Nos. 2017-769 and 2017-770 was sent to SCE&G and has been responded to. Commission Order Nos. 2017-769 and 2017-770 were issued in Docket Nos. 2017-305-E and 2017-207-E. The First Continuing Audit Information Request for Records and Information Pursuant to Commission Order Nos. 2017-769 and 2017-770 is being treated as a chronology separate and apart from the AIRs referenced above. For clarity, Dominion Energy, Inc. was not served the AIR issued pursuant to Order Nos. 2017-769 and 2017-770 or the 1<sup>st</sup> Continuing AIR in Docket No. 2017-207-E.

**BEFORE**

**THE PUBLIC SERVICE COMMISSION OF**

## SOUTH CAROLINA

**DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

**IN RE:** Friends of the Earth and Sierra Club,  
Complainant/Petitioner v. South Carolina  
Electric & Gas Company,  
Defendant/Respondent

**IN RE:** Request of the South Carolina Office of  
Regulatory Staff for Rate Relief to SCE&G  
Rates Pursuant to S.C. Code Ann. § 58-27-  
920

**IN RE:** Joint Application and Petition of South  
Carolina Electric & Gas Company and  
Dominion Energy, Incorporated for Review  
and Approval of a Proposed Business  
Combination between SCANA Corporation  
and Dominion Energy, Incorporated, as May  
Be Required, and for a Prudency  
Determination Regarding the Abandonment  
of the V.C. Summer Units 2 & 3 Project  
and Associated Customer Benefits and Cost  
Recovery Plans

**TO:** K. CHAD BURGESS, ESQ., MATTHEW W. GISSENDANNER, ESQ., MITCHELL  
WILLOUGHBY, ESQ., AND BELTON T. ZEIGLER, ESQ., REPRESENTATIVES  
FOR SOUTH CAROLINA ELECTRIC & GAS COMPANY AND ROBERT A.  
MUCKENFUSS, ESQ., LISA S. BOOTH, ESQ., JOSEPH K. REID, III, ESQ., AND  
ELAINE S. RYAN, ESQ., REPRESENTATIVES FOR DOMINION ENERGY,  
INC.:

## I. INSTRUCTIONS

The South Carolina Office of Regulatory Staff (“ORS”) hereby requests, pursuant to S.C. Code Ann. §§ 58-4-50(A)(2), 58-4-55(A), 58-27-160, 58-27-1570, 58-27-1580, and 58-33-277 that South Carolina Electric & Gas Company (“SCE&G” or “Company”) and Dominion Energy, Inc. (“Dominion”) (collectively the “Parties” or “Applicants”) provide responses in writing and under oath and serve the undersigned on or before March 29, 2018 to ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201 and to the attention of Lane Kollen, J. Kennedy and Associates, Inc., 570 Colonial Park Drive, Suite 305, Roswell, GA 30075. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these audit requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these audit requests, "address" means mailing address and business address. When asked to identify or provide a document, "identify" and "provide" mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this audit request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

**IT IS THEREFORE REQUESTED:**

- Pursuant to S.C. Code Ann. § 58-4-55(A) that responses be submitted under oath.
- That SCANA/SCE&G respond only unless Dominion is included in the request.
- All information shall be provided to ORS in the format requested.
- All responses to the requests below must be labeled using the same numbers as the requests.
- Unless otherwise agreed, the requested information shall be bound in 3-ring binders with numbered tabs between each question. The question should be reproduced at the beginning of each tab for the responses included. All exhibits shall be reduced or expanded to 8 ½" x 11" formats, where practical.
- If information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place a copy of the requested information in the appropriate numerical sequence.
- Any inquiries or communications requesting clarification of the information requested should be directed to Dawn Hipp [803.737.0814], Anthony James [803.737.2090], Jay Jashinsky [803.737.1984], Jeffrey M. Nelson, Esquire [803.737.0823], or Shannon Bowyer Hudson, Esquire [803.737.0889] of ORS.
- This entire list of questions shall be reproduced and included in front of each set of responses.
- Unless otherwise set forth below, the Parties shall provide four (4) sets of CDs with each containing a set of the responses in a searchable format, and seven (7) paper copies/binders of responses to ORS. In addition, the Parties shall load the e-room with the responses the same day the responses are due to ORS. Parties shall provide one (1) set of CDs with each containing a set of the responses to Lane Kollen, J. Kennedy and Associates, Inc., 570 Colonial Park Drive, Suite 305, Roswell, GA 30075, [770-992-2027] via overnight delivery. In addition, it is requested that the Parties provide working copies of all spreadsheets (not in Adobe) with all formulas and calculations intact to ORS and J. Kennedy Associates (via the e-room).
- If the response to any request is that the information requested is not currently available, please state when the information requested will be provided to ORS. This statement is not a waiver of the deadline for all other responses.



- In addition to the signature and verification at the close of the Parties' responses, the Parties' witness(es), employee(s), contractor(s) or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
- This request shall be deemed to be continuing so as to require SCE&G to supplement or amend its responses as any additional information becomes available.
- For responses regarding the V.C. Summer Units 2 & 3 Project (the "NND Project"), please provide all responses to reflect SCE&G's 55% participation where possible. Where this request is not possible, please clearly identify whether the responses reflect 100% or 55% dollars.
- The following Attachments are to be completed as requested below:
  - None

## **II. REQUESTS**

### **Acronyms**

For purposes of the following information requests, the following acronyms apply:

Dominion Energy, Inc. ("Dominion")

Dominion Energy Services, Inc. ("DES")

Federal Energy Regulatory Commission ("FERC")

SCANA Corporation ("SCANA")

SCANA Services, Inc. ("SCANA Services")

South Carolina Electric & Gas Company ("SCE&G")

Sedona Corp. ("Sedona") – Dominion Subsidiary Created to Accomplish Merger

Public Service Commission of South Carolina ("Commission")

### **Merger Approvals Required and Legal Standards**

- 4-1 Provide the legal standards that Applicants believe are applicable in the Commission's review and approval of the proposed merger. In addition, provide support that the proposed merger meets the applicable legal standards.
- 4-2 Provide an unredacted version of all filings made by Applicants and/or related entities in other jurisdictions seeking approval of the transaction or providing information related to the transaction. In addition, provide the case or docket numbers assigned in each of the other jurisdictions.

- 4-3 Describe the approvals that will need to be sought by Applicants from rate authorities in other jurisdictions and the legal standards for approval in those jurisdictions, including the FERC.

**Merger Transaction and Transition Costs, Integration Activities, Savings, and Ratemaking**

- 4-4 Provide the Applicants' working definitions of goodwill and acquisition premium and describe the manner in which goodwill and/or acquisition premium will be calculated and recorded for each relevant entity, including the FERC accounts/subaccounts that will be used for this purpose. If the terms goodwill and acquisition premium are not considered interchangeable, then differentiate the two terms and the costs that are considered goodwill versus the costs that are considered acquisition premium.
- 4-5 Confirm that Dominion will record the goodwill and acquisition premium related to the proposed transaction on its accounting books and that neither SCANA nor SCE&G will record the goodwill and acquisition premium on their accounting books. If this is not correct, then provide a correct statement of the Applicants' proposal.
- 4-6 Provide the Applicants' working definition of fair value as that term is used in the quantification of goodwill and/or acquisition premium and describe the manner in which the fair value will be calculated and recorded for each relevant entity, including the FERC accounts/subaccounts that will be used for this purpose.
- 4-7 Confirm that neither SCANA nor SCE&G will record fair value in excess of net book value related to the proposed transaction on their accounting books. If this is not correct, then provide a correct statement of the Applicants' proposal.
- 4-8 Provide the Applicants' working definition of transaction costs and list each such cost that falls within this definition. In addition, describe the manner in which transaction costs will be incurred and recorded by each relevant entity, including charges to and from other affiliates. Provide and describe the FERC accounts/subaccounts that will be used for these purposes and the costs that will be recorded in each such account/subaccount.
- 4-9 Confirm that neither SCANA nor SCE&G will record transaction costs on their accounting books related to the proposed transaction, or, if they are, then all such costs will be charged to and reimbursed by Dominion. If this is not correct, then provide a correct statement of the Applicants' proposal.
- 4-10 Confirm that SCE&G will not seek to recover transaction costs related to the proposed transaction from its customers. If this is not correct, then provide a correct statement of the Applicants' proposal.

- 4-11 Provide the Applicants' working definition of transition costs and list each such cost that falls within this definition. Explain why the Applicants believe that each such cost should be considered a transition cost and not a transaction cost. In addition, describe the manner in which transition costs will be incurred and recorded by each relevant entity, including charges to and from other affiliates. Provide and describe the FERC accounts/subaccounts that will be used for these purposes and the costs that will be recorded in each such account/subaccount.
- 4-12 In regards to the deferral and potential future recovery of some or all transition costs by SCE&G:
- a. Provide a detailed description of Applicants' proposal, if any, to specifically track and record such costs for accounting and/or ratemaking purposes. Separately address capital expenditures and expenses.
  - b. Provide a detailed description of Petitioners' proposal, if any, to flow through to customers the synergy savings from the merger.
  - c. Confirm that no portion of the proposed SCE&G 3.5% rate reduction is for the purpose of flowing through to customers the synergy savings from the merger. If this is not correct, then provide a correct statement of the Applicants' proposal.
- 4-13 Identify and quantify all transaction costs by entity, including costs that have been or may be incurred by Dominion, DES, Sedona, SCANA, SCANA Services, SCE&G, and/or other affiliates. Indicate whether the transaction costs are retained by the holding companies, charged to SCANA or SCE&G, charged out by SCE&G to SCANA or reimbursed by some Dominion entity. Provide all assumptions, data, studies, and calculations, including electronic models and/or spreadsheets relied on for this purpose. In addition, please identify the FERC account(s) in which each entity will record such costs.
- 4-14 Provide a copy of all integration/transition studies, analyses, and status/progress reports that address the organization, activities, staffing, costs, and/or savings to integrate SCANA and SCE&G into the Dominion organization structure, including the consolidation of centralized, shared, and common services in DES. Provide updates to your response as the integration/transition process proceeds.
- 4-15 Identify and quantify all *pre-closing* (or Day 1) transition (integration) costs and savings, including costs that have been or will be incurred by Dominion, DES, Sedona, SCANA, SCANA Services, SCE&G, and/or other affiliates. Transition costs, for purposes of this request, include costs that have been or will be incurred to integrate the two holding companies, two service companies, and SCE&G. Provide all assumptions, data, studies, and calculations, including electronic models and/or



spreadsheets relied on for this purpose. Separate the transition costs into those that will not achieve savings and those that may achieve savings.

- 4-16 Identify and quantify all *post*-closing transition (integration) costs and savings including costs that will be incurred by Dominion, DES, Sedona, SCANA, SCANA Services, SCE&G, and/or other affiliates. Transition costs, for purposes of this request, include costs that will be incurred to integrate the two holding companies, two service companies, and SCE&G. Provide all assumptions, data, studies, and calculations, including electronic models and/or spreadsheets relied on for this purpose. Separate the transition costs into those that will not achieve savings and those that may achieve savings.
- 4-17 Identify and describe each of the hardware platform systems and software systems presently used by Dominion, DES, SCANA, SCANA Services, and SCE&G (separately) for the following purposes:
- a. General ledger and sub-ledger (identify each sub-ledger) accounting.
  - b. Financial reporting.
  - c. Management reporting.
  - d. Regulatory reporting.
  - e. Financial forecasting and strategic planning.
  - f. Accounts payable.
  - g. Human resources.
  - h. Engineering.
  - i. Construction project management.
  - j. Distribution maintenance.
  - k. Customer billing.
  - l. Customer service.
  - m. Accounts payable.
  - n. Cash management.
  - o. Procurement.
  - p. Each other specifically identifiable hardware platform system and software system.
- 4-18 Refer to the responses to each subpart of the previous question.
- a. Identify and describe all activities that will be necessary to integrate each of the hardware platform systems and software systems among and between Dominion, DES, SCANA, SCANA Services, and SCE&G. In addition, describe the planned timing for each such activity.
  - b. Describe and provide a copy of all studies, analyses, implementation/action plans, and/or the related costs to integrate each of the hardware platform systems and software systems among and between Dominion, DES, SCANA, SCANA Services, and SCE&G.

- c. Describe all activities that now are in progress to integrate each of the hardware platform systems and software systems among and between Dominion, DES, SCANA, SCANA Services, and SCE&G. In addition, describe the status of each such activity. Provide an update to this request every two weeks throughout the pendency of this proceeding.
- 4-19 Indicate whether Dominion relied on its own experience and/or studied the mergers of other holding companies and/or utilities to identify and/or quantify transaction costs, transition costs, and/or synergy savings. If so, then provide a copy of all such studies and/or analyses. If not, explain why it did not.
- 4-20 Refer to the Application at 17, par. 37. Please provide a copy of all studies and/or analyses that address the integration of centralized services presently provided by SCANA Services into DES, including, but not limited to, functions, staffing, location, costs, and savings.

#### **Financing**

- 4-21 Provide a copy of all presentations to securities analysts and bond rating agencies made by Dominion Energy, South Carolina Electric & Gas, and/or SCANA regarding the proposed business combination.
- 4-22 Describe in detail Dominion's plan to finance the proposed business combination, including, but not limited to, the issuance of additional shares of common equity and debt financing by Dominion itself or an affiliate. Provide a copy of all analyses, studies, and other source documents relied on to determine and assess this plan.
- 4-23 Describe in detail each alternative considered by Dominion to finance the proposed business combination. Provide a copy of all analyses, studies, and other source documents relied on to determine and assess these alternatives.
- 4-24 Provide a copy of all studies prepared by or on behalf of Dominion that were used to establish the value of SCANA Corp. for purposes of the proposed business combination. Provide a narrative description of all assumptions, including, but not limited to, financing, merger transaction costs, merger transition costs not incurred to achieve savings, merger transition costs incurred to achieve savings, synergy savings, and income tax savings due to the Tax Cuts and Jobs Act, among others.

#### **Corporate Governance and Ring-Fencing**

- 4-25 Provide a copy of all studies, analyses, or presentations made to the Dominion Board of Directors in regards to the proposed merger.

- 4-26 Provide a copy of all studies, analyses, or presentations made to the SCANA Board of Directors in regards to the proposed merger.
- 4-27 Provide a copy of all studies, analyses, or presentations made to the SCE&G Board of Directors in regards to the proposed merger.
- 4-28 Describe the present SCANA Board of Directors, including the composition of the directors, e.g., independent directors, SCANA officers, etc.
- 4-29 Describe the changes that will be made to the SCANA Board of Directors after the merger closes, including the composition of the directors, e.g., independent directors, Dominion officers, etc.
- 4-30 Describe the present SCE&G Board of Directors, including the composition of the directors, e.g., independent directors, SCANA or SCE&G officers, etc.
- 4-31 Describe the changes that will be made to the SCE&G Board of Directors after the merger closes. Please indicate whether there will be a Board of Directors and, if so, the composition of the directors, e.g., independent directors, Dominion officers, etc.
- 4-32 Please describe the legal entity structure, e.g., corporation, of SCANA after the merger closes. Also address whether Dominion will seek to change the legal entity structure post proposed merger.
- 4-33 Please describe the legal entity structure, e.g., corporation, of SCE&G after the merger closes. Also address whether Dominion will seek to change the legal entity structure post proposed merger.
- 4-34 Provide a copy of the present service agreement between SCANA Services and SCE&G (prior to the proposed merger).
- 4-35 Provide a copy of the present service agreement between DES and Virginia Electric and Power Company. Indicate whether this agreement will provide the template for the service agreement between DES and SCE&G.
- 4-36 Provide a copy of the proposed service agreement between DES and SCE&G (effective post proposed merger).
- 4-37 Provide a copy of the present SCANA Services cost allocation manual(s) ("CAM") which describes the allocation of shared costs over its organization.
- 4-38 Provide a copy of the present DES CAM(s).

- 4-39 Provide a copy of the present Tax Sharing or Tax Allocation Agreement between SCANA and SCE&G (prior to the proposed merger).
- 4-40 Provide a copy of the present Tax Sharing or Tax Allocation Agreement between Dominion and its present affiliates.
- 4-41 Provide a copy of the proposed Tax Sharing or Tax Allocation Agreement between Dominion and SCANA, SCE&G, and all other SCANA affiliates (effective post proposed merger).

#### **Credit Quality and Risks**

- 4-42 Provide a copy of all presentations to securities analysts and/or bond rating agencies addressing the proposed transaction, including a copy of all support developed for quantifications and other assertions in such presentations.
- 4-43 Provide a copy of all securities analysts reports that address the proposed transaction.
- 4-44 Provide a copy of all bond rating agency reports that address the proposed transaction.
- 4-45 Indicate whether Dominion or SCANA requested any advisory opinions, indicative ratings analyses, or other analyses or opinions from the bond rating agencies relating to the proposed merger.
  - a. If the answer is yes, provide a copy of all supporting materials and analyses provided to the bond rating agencies.
  - b. If the answer is yes, provide a copy of any advisory opinions, indicative ratings analyses, or any other material from the bond rating agencies.
  - c. If the answer is no, explain why no such opinions, indicative ratings analyses, or other opinions were sought from the bond rating agencies.

#### **Service Quality**

- 4-46 Refer to the Application at page 22. At paragraph 53, it states that customers of regulated electric and natural gas utilities “expect safe, reliable, and quality service.”
  - a. Please describe the specific measures Dominion will undertake to ensure safe, reliable, and quality service to South Carolina’s utility customers.
  - b. Please describe how Dominion will monitor and quantify whether safe, reliable, and quality service is maintained after the proposed transaction. Include a

discussion of specific measurements Dominion will use to monitor reliability and quality of service to South Carolina customers.

- 4-47 Provide all service quality measures and standards that are currently effective for each of Dominion's regulated utility operating companies.
- 4-48 Provide a copy of all ongoing service quality and reliability reports filed with regulatory commissions by Dominion's regulated utility operating companies from 2015 through 2018.
- 4-49 Provide all service quality measures and standards that are currently effective for SCE&G. Identify which of these measures and standards have been established and/or approved by the Commission.
- 4-50 Provide a copy of all ongoing service quality and reliability reports filed by SCE&G with the Commission from 2015 through 2018.

**Staffing, Employee Welfare, Bargaining Unit**

- 4-51 Provide draft copies of all officer and employee retention plans, severance plans, and all other officer and employee related plans that will affect current SCANA, SCANA Services, and/or SCE&G employees after the merger closes. If not currently available, provide copies as they become available.
- 4-52 Describe and provide a copy of all plans to integrate the employees of SCANA, SCANA Services, and SCE&G into the Dominion employee benefits and welfare plans, including the pension plan, other post-retirement and post-employment benefit plans, 401(k) and other savings plans, vision and dental plans, life insurance and disability (short term and long term) plans, and paid time off.
- 4-53 Provide Summary Plan descriptions of the employee benefits presently provided by Dominion, SCANA, and SCE&G (if different than SCANA) for:
  - a. Pension Plans
  - b. Post-Retirement and Post-Employment Plans
  - c. Health Care Plans
  - d. 401(k) and Other Savings Plans
  - e. Vision and Dental Plans
  - f. Life Insurance and Disability Plans
  - g. Paid Time Off Plans
- 4-54 Provide a side by side comparison of each of the plans listed in the preceding question, indicate which plan does or will provide SCE&G employees better benefits, and provide the present cost per employee of each plan.

- 4-55 Describe how Applicants plan to address employees whose positions are eliminated as a result of the merger. Address whether SCANA and SCE&G employees will be given special consideration for positions at Dominion and its affiliates? Also, address planned severance packages.
- 4-56 Describe any plans to guarantee positions for a limited period of time following the merger for current SCANA, SCANA Services, and SCE&G employees. If so, describe those plans in detail.
- 4-57 Describe how the SCANA 401(k) plan and pension plans will be integrated into the Dominion plans and provide the following information:
- a. Will Dominion assume the SCANA 401(k) and pension plans or terminate the plans and transfer assets to the Dominion plans?
  - b. Describe how rollovers will take place for SCANA employee investments in their 401K plan and pension plans.
  - c. What is the Dominion vesting period?
  - d. Will vested employees of SCANA be immediately vested in the Dominion system?
  - e. Will vested employees of SCANA be able to rollover employer matching contributions?
- 4-58 Please identify and describe all bargaining units at Dominion, DES, SCANA, SCANA Services, and SCE&G, and describe the employees that are covered by such bargaining agreements.
- 4-59 Provide a copy of all bargaining agreements at SCANA, SCANA Services, and SCE&G.
- 4-60 Describe how Dominion will transition the SCANA and SCE&G bargaining agreements to Dominion and DES and whether the bargaining units and agreements will be amended in any manner to accommodate the transition.

#### **NND Costs Accounting and Ratemaking**

- 4-61 Provide a schedule showing the SCE&G CWIP balance of the NND costs for each month from January 2015 through the date at which construction on the units was terminated. Separate the CWIP balance into direct and AFUDC.



- 4-62 Provide the SCE&G accounting entries to record the reclassification of the NND costs from CWIP to regulatory assets, maintaining the separation of the CWIP balance between directs and AFUDC provided in response to the immediately preceding question.
- 4-63 Provide the calculations of AFUDC on the NND costs for each month from January 2015 through the date at which construction on the units was terminated. Provide the calculations in live electronic spreadsheet format with all formulas intact.
- 4-64 Provide the SCE&G ADIT by temporary difference related to the NND costs for each month from January 2015 through the most recent month available. Separate the ADIT related to the NND costs included in revised rates and the ADIT related to the NND impairment writeoffs in September 2017 and December 2017. Provide all calculations of these temporary differences and the related ADIT, including all workpapers and electronic spreadsheets in live format with all formulas intact.
- 4-65 Provide the SCE&G accounting entries for each month through the most recent month available to record costs and income incurred after construction termination, including, but not limited to, contract cancellation costs, liquidated damages costs, employee severance costs, site demobilization costs, and salvage income, if any. Provide all estimates and/or calculations relied on for these accounting entries, including all workpapers and electronic spreadsheets in live format with all formulas intact.
- 4-66 Provide the SCE&G accounting entries for the impairment losses recorded in September 2017 and December 2017, including the related income tax effects, along with all calculations, including workpapers and electronic spreadsheets in live format with all formulas intact. For each of the impairment losses, separate the losses into directs and AFUDC.
- 4-67 Provide the SCE&G accounting entries related to the Toshiba guarantee payments, including, but not limited to, the recording of the receivable, the receipt of the first payment, the sale of the receivable to Citibank, and the discount due to the monetization from the sale of the receivable to Citibank. In addition, provide the related income tax accounting entries, including the calculations and workpapers used for this purpose.
- 4-68 Indicate whether SCE&G records a deferred return on the Toshiba payment regulatory liability. If so, provide the accounting entries related to the deferred return for each month since it began recording these entries. If not, describe how these funds have been invested and the return that was earned. In addition, confirm that the avoided financing costs have been accretive to SCE&G earnings.
- 4-69 Provide a copy of all analyses performed by or for SCE&G that assessed the monetization and/or the economics of the monetization of the Toshiba payment.

- 4-70 Confirm that it is SCE&G's present position that the Toshiba payment regulatory liability be recorded net of the discount due to the Citibank monetization and that the Company should retain the earnings on the Toshiba payment proceeds received directly from Toshiba and from the Citibank monetization. If that is SCE&G's present position, then address the equities of this position from a customer perspective.
- 4-71 Provide each component of the NND costs, including, but not limited to, CWIP, AFUDC, and ADIT included in revised rates presently in effect. Provide a schedule annotating these amounts to SCE&G's filing and the resulting approved revenue requirement.
- 4-72 Provide a copy of the most recent SCE&G corporate financial model in live format, including all data, assumptions, and standard reports.
- 4-73 Provide a copy of the SCE&G corporate financial model in live format used as a base case to assess the effects of the proposed merger on SCE&G's financial statements.
- 4-74 Provide a copy of the SCE&G corporate financial model scenarios used to assess the customer benefits plan, no benefits plan, base request, and each other ratemaking alternative considered by SCE&G and/or Dominion.
- 4-75 Provide a copy of the analyses used to determine the magnitude (dollars and percentages) for the proposed 3.5% base rate reduction pursuant to the Application. Provide all calculations and workpapers, including electronic spreadsheets in live format and with all formulas intact.

#### **Income Taxes and Savings from Tax Cuts and Jobs Act**

- 4-76 Provide a calculation of the income tax expense included in SCE&G's present revised rates based on the test year used in the 2016 revised rate proceeding. Provide all calculations and workpapers, including electronic spreadsheets in live format and with all formulas intact.
- 4-77 Provide the SCE&G protected excess ADIT by temporary difference at December 31, 2017 separated into electric and gas.
- 4-78 Provide the SCE&G unprotected excess ADIT by temporary difference at December 31, 2017 separated into electric and gas.
- 4-79 Provide the SCE&G estimated amortization of protected (depreciation-related) excess ADIT using ARAM for 2018 and each year thereafter through 2027.

- 4-80 Indicate whether SCE&G has deferred the amortization of protected excess ADIT or has taken the negative amortization expense to income since January 1, 2018.
- 4-81 Indicate whether SCE&G has deferred the amortization of unprotected excess ADIT or has taken the negative amortization expense to income since January 1, 2018.
- 4-82 Provide Dominion's calculations of the estimated SCE&G income tax expense savings, amortization of protected excess ADIT, and amortization of unprotected excess ADIT for each year 2018 through 2027 separated into electric and gas. Provide all assumptions, data, calculations and workpapers, including electronic spreadsheets in live format and with all formulas intact.
- 4-83 Provide a copy of the analyses used to determine the magnitude (dollars and percentages) for the proposed 1.5% base rate reduction for SCE&G income tax savings pursuant to the Application. Provide all calculations and workpapers, including electronic spreadsheets in live format and with all formulas intact. Provide all data, copies of source documents, and all assumptions, including any input and/or calculated amounts, e.g., reductions in income tax expense, protected and unprotected excess ADIT, amortization periods, and negative amortization expense.
- 4-84 Confirm that SCANA is presently treated as a traditional C corporation for federal and state income tax purposes and that all of its affiliates are included in SCANA's federal and state consolidated income tax returns.
- 4-85 Describe how SCE&G is presently treated for federal and state income tax purposes, e.g., traditional C corporation consolidated with SCANA for federal and state consolidated income tax return purposes, or something else.
- 4-86 Describe how SCANA will be treated for federal and state income tax purposes after the merger closes, e.g., traditional C corporation consolidated with the Dominion affiliate group for federal and state consolidated income tax return purposes, or something else.
- 4-87 Describe how SCE&G will be treated for federal and state income tax purposes after the merger closes, e.g., traditional C corporation consolidated with the Dominion affiliate group for federal and state consolidated income tax return purposes, or something else.

Shannon B. Hudson

Jeffrey M. Nelson, Esquire  
Shannon B. Hudson, Esquire  
Jenny R. Pittman, Esquire  
South Carolina Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201  
Telephone: (803) 737-0823  
(803) 737-0889  
(803) 737-0794  
Fax: (803) 737-0895  
Email: [jnelson@regstaff.sc.gov](mailto:jnelson@regstaff.sc.gov)  
[shudson@regstaff.sc.gov](mailto:shudson@regstaff.sc.gov)  
[jpittman@regstaff.sc.gov](mailto:jpittman@regstaff.sc.gov)

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